



The Hon. Sylvia O. Hinds-Radix
Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**
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MEMO ENDORSED, page 2

August 3, 2022

VIA ECF

The Hon. Edgardo Ramos
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *R.G.C. v. New York City Dep't of Educ.*, 21-cv-7465 (ER)

Dear Judge Ramos:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, supervising attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys fees' costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write on behalf all parties to respectfully request that the Initial Conference scheduled for August 4, 2022 be adjourned for 30 days, from August 3 to September 2, 2022. This is the first request to adjourn the conference, and we apologize for the lateness of this request and the inconvenience caused to the Court. In the last hour, the parties have had a productive telephone conversation regarding settlement, and believe that the adjournment will allow us to resolve this case without the need for a conference or motion practice.

Accordingly, the parties request that the Initial Conference be adjourned to September 2, 2022, with a next status letter due on that date.

Thank you for considering this request.

Respectfully submitted,

/s/ Martin Bowe
Martin Bowe, Esq.
Senior Assistant Corporation Counsel

cc: Ellen Saideman, Esq. (via ECF)

The initial pre-trial conference scheduled for August 4, 2022 is adjourned to September 6, 2022 at 11:30 a.m., with a status letter due on that date. The parties are instructed to call the Court at (877) 411-9748 and use access code 3029857#. It is SO ORDERED.



Edgardo Ramos, U.S.D.J
Dated: August 3, 2022
New York, New York